

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

M.A. HANNA PLASTICS GROUP, INC.;
WILMINGTON ECONOMIC
DEVELOPMENT CORPORATION; and
SIDNEY and CAROL MAFFETT,

Defendants.

CIVIL ACTION NO.: 06-409-GMS

**DEFENDANT M.A. PLASTICS GROUP, INC.'S OBJECTIONS AND RESPONSES TO
UNITED STATES' SECOND SET OF INTERROGATORIES**

PLEASE TAKE NOTICE that Defendant, M.A. Hanna Plastics Group, Inc. ("M.A. Hanna"), hereby provides answers to Plaintiff's Second Set of Interrogatories within the time prescribed by the Rules of Court as follows:

GENERAL OBJECTIONS

M.A. Hanna submits the following answers and objections to the Second Set of Interrogatories dated November 16, 2007, propounded by United States. As a general response, M.A. Hanna objects to each Interrogatory to the extent that each seeks matters not discoverable under the attorney-client privilege or the work-product doctrine. M.A. Hanna reserves the right to object to future discovery on the within matters (or related matters), and does not waive its objections by providing the information included in these responses and producing documents

for discovery and inspection. M.A. Hanna further reserves the right to object to the admissibility of any of the responses made herein and documents produced (or issues relating to them), in whole or in part, at trial in this action on any grounds, including, but not limited to, materiality, relevance, and privilege. M.A. Hanna reserves the right to supplement its responses.

ANSWERS TO SECOND SET OF INTERROGATORIES

1. Set forth in detail the basis for each and every denial contained in M.A. Hanna's Response to United States' First Request for Admissions, including stating every fact you contend supports each denial.

RESPONSE:

See documents, previously produced.

2. With respect to M.A. Hanna's Responses to United States' First Request for Admissions numbers 15, 16, 18 and 19, denying any relevant "direct" information, identify for each request all sources of information whether "direct," or "indirect" or otherwise which are available to M.A. Hanna, as for each, state in detail the substance of that information.

RESPONSE:

M.A. Hanna objects to this interrogatory on the grounds it is unintelligible.

3. Describe all good faith efforts made by M.A. Hanna to obtain information responsive to United States' First Request for Admissions, identifying each possible source of information.

RESPONSE:

M.A. Hanna has previously described all efforts made by it to obtain documents responsive to United States' First Request for Admissions. In addition, M.A. Hanna has previously produced documents responsive to United States' First and Second Request for Admissions. See documents previously produced.

Dated: January 29, 2008

By: /s/ John A. Macconi, Jr.
JOHN A. MACCONI, JR., ESQUIRE
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
1220 North Market Street, 5th Floor
P.O. Box 8888
Wilmington, DE 19899-8888
302-552-4300
On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

OF COUNSEL:

LILA WYNNE, ESQUIRE
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
Woodland Falls Corporate Park
200 Lake Drive East, Suite 300
Cherry Hill, NJ 08002
856-414-6000
On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

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Plaintiff

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M.A. HANNA PLASTICS GROUP, INC.,
WILMINGTON ECONOMIC DEVELOPMENT
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MAFFETT,

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NOTICE OF SERVICE

PLEASE TAKE NOTICE that on January 29, 2008, a true and correct copy of
Defendant, M.A. Hanna Plastics Group, Inc.'s Objections and Responses to Plaintiff,
United States' Second Set of Interrogatories were served on counsel as identified below:

VIA E-FILE

Patricia C. Hannigan, Esquire
U.S. Attorney's Office
The Nemours Building
1007 Orange Street, Suite 700
Wilmington, Delaware 19899-2046

VIA E-FILE

Robert W. Whetzel, Esquire
Todd A. Coomes, Esquire
Richards, Layton & Finger PA
One Rodney Square
920 North King Street
Wilmington, Delaware 19801

By: /s/ John A. Macconi, Jr. DE ID No. 4430
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On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

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On behalf of Defendant,
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